



Feeding Bodies. Fueling Minds.™

July 27, 2018

Ms. Holly Figueroa
Special Nutrition Evaluation Branch
Office of Policy Support
Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive, Room 1014
Alexandria, VA 22302

ELECTRONIC DELIVERY

Dear Ms. Figueroa:

These comments are being submitted on behalf of the more than 57,000 members of the School Nutrition Association (SNA) in response to the request for comment on the U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS) Child Nutrition Program Operations Study II (CN-OPS-II), published in the Federal Register on June 13, 2018, OMB Number 0584-0607. As stated in the comment request, this collection is a revision of the currently approved collection for CN-OPS-II. The purpose of the revision is to update the survey instruments for school year (SY) 2018-19 to include topics of current interest and collect timely data to inform Child Nutrition Programs' operations.

While SNA recognizes the value of FNS studies, these surveys place a considerable burden on school districts because of the time involved to pull necessary data and then to complete the surveys. It is a challenge for directors to divert attention from every day operations to complete surveys. FNS should work to minimize the burden on school district personnel and be proactive in providing electronic resources to selected school districts. As the notice mentions, the survey is being revised to incorporate questions reflective of current trends in operations. Hopefully, those questions will be phrased in a clear and concise manner in order to minimize the data collection burden and provide valuable data collection.

For your reference, we have enclosed comments submitted in December 2016 related to the CN-OPS II study. Thank you for this opportunity to provide FNS with input related to the study.

Sincerely,

Gay Anderson, SNS
President

Patricia Montague, CAE
Chief Executive Officer



December 5, 2016

Devin Wallace-Williams, Ph.D.
Social Science Research Analyst
Office of Policy Support
Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive
Alexandria, VA 22302

ELECTRONIC DELIVERY

Dear Dr. Wallace-Williams:

These comments are being submitted on behalf of the more than 57,000 members of the School Nutrition Association (SNA) in response to the request for comment on the U.S. Department of Agriculture's (USDA) Child Nutrition Program Operations Study II (CN-OPS-II), published in the Federal Register on October 4, 2016, OMB Number 0584-0607. As stated in the request, the study will collect and analyze data on program policies to provide input for new legislation and technical assistance and training for program implementation staff. Although SNA greatly appreciates USDA's efforts to report on child nutrition program operations, we have a number of concerns related to the burden of data collection on participants in the study:

- USDA estimates that the hard copy pretest and self-administered web/telephone survey will each take two hours to complete, estimates can often miss the mark. Some SFA Director participants in the recent Special Nutrition Program Operations Study (SN-OPS) indicated the required data collection in years 2 and 3 was extremely burdensome, taking much longer than estimated.
- We noted that since the April 29, 2015 Federal Register Notice request for comments on CN-OPS-II, the number of School Food Authority (SFA) directors that will participate in this survey has increased from 1,500 to 1,750. The need for additional respondents is a concern given the burden of data collection.
- As we have previously stated in our comments pertaining to other research activities, USDA's data collection instruments should allow for ease of use, uploading of data files in formats friendly to school nutrition users, completion of data collection at different intervals and the ability to save the questionnaire as it is completed.
- We encourage USDA to minimize the redundancy of collecting data from survey participants that has previously been captured through state agency administrative review procedures or other State Agency data collection. To reduce the burden on school district personnel, we recommend USDA convene an advisory group of school nutrition directors and state agency directors to review the collection instruments and identify redundant data elements.

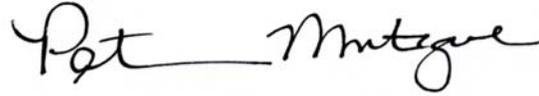
- Finally, to ensure the most accurate responses, we encourage USDA to take every effort to draft clearly written, focused questions. The questionnaires for years 2 and 3 of SN-OPS had a number of confusing and broadly written questions. Focused questions would elicit more targeted information to aid in the development of technical assistance and training resources for program implementation personnel. An advisory committee would assist all in gathering information and reaching USDA's ultimate goals as outlined in the notice.

On behalf of our membership, we appreciate this opportunity to submit these comments.

Sincerely,



Becky Domokos-Bays, Ph.D., RD, SNS
President



Patricia Montague, CAE
Chief Executive Officer